



THE CITY OF NEW YORK
LAW DEPARTMENT
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January 19, 2018

Via ECF

Hon. George B. Daniels, U.S.D.J.
United States District Court
500 Pearl Street
New York, N.Y. 10007

Re: Handberry v. Thompson, Civil Action No. 96 Civ. 6161 (GBD/JCF)
**AMENDED Second Extension Request to extend the due date from
January 19 to February 2, 2018**, for filing objections to and/or
motions to modify or adopt the Special Master's Second Report

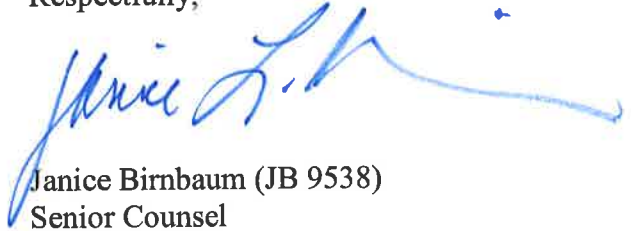
Dear Judge Daniels:

I am an Assistant Corporation Counsel and am assigned to defend the City of New York (on behalf of its mayoral agency, the New York City Department of Correction) and the New York City Department of Education ("City Defendants") in the above-referenced action.

By this letter, I amend the City Defendants' request submitted yesterday (Dkt. No. 260) for a second extension of the due date for filing objections to and/or motions to modify and/or adopt the Special Master's "Second Report on the Status of Educational Services for Youth Aged 16-21 at Rikers Island," dated December 19, 2017 ("Second Report") to correct the inadvertent omission that **this request is for a two week extension of the filing date from January 19, 2018 (today) to February 2, 2018**. This filing date has been extended once from January 9 to January 19, 2018. The additional time is needed to enable my clients to complete their search and hopefully locate certain records that should either confirm or dispute certain facts asserted in the Second Report. The additional time is also needed to enable my clients and me to complete our records review, further confer, and if warranted, craft appropriate objections. As noted above, this is City Defendants' second request for an extension of the aforesaid filing date. Plaintiffs consent to this request. The requested extension does not affect any other dates scheduled in this matter.

I apologize for the inadvertent omission noted above and the lateness of this amended request. I thank the Court for its consideration and ask that the Court approve this amended extension request.

Respectfully,

A handwritten signature in blue ink, appearing to read "Janice L. B.", with a long, sweeping horizontal line extending to the right.

Janice Birnbaum (JB 9538)
Senior Counsel